

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA**

AT CHARLESTON

UNITED STATES OF AMERICA,

VS.

CASE NO. 2:18-cr-00261

JUANITA CARRIE HAYNES,

DEFENDANT.

**SUPPLEMENTAL MEMORANDUM OF LAW IN SUPPORT OF
MOTION FOR COMPASSIONATE RELEASE**

Now comes the Defendant, Juanita Carrie Haynes, by counsel, Timothy J. LaFon, and supplements her original Memorandum of Law in Support of her Motion for Compassionate Release pursuant to 18 U.S.C. §3582(c)(1)(A) to include the following facts that have occurred since filing. Defendant incorporates by reference the First Memorandum of Law.

I. SUPPLEMENTAL STATEMENT OF MEDICAL CONDITION

As previously provided to the Court, Juanita Haynes was diagnosed with COVID-19 on or about December 15, 2021. She was taken to Greenbrier Valley Medical Center for breathing treatments on at least two (2) occasions, and at the time the Motion was filed, upon information and belief, there were an insufficient amount of guards at Alderson to take her back to the hospital for additional breathing treatments.

Ms. Haynes was taken back to the hospital on Christmas Day, December 25, 2021, and placed on life support.

Her daughter, Patricia Haynes, has been attempting to find out her condition and visit with her; however, she has been given limited information and only allowed to visit with her mother for thirty (30) minutes on December 26, 2021.

Because of these exigent circumstances, it is appropriate for the Court to Grant this Motion for Compassionate Release under these emergent circumstances and release Juanita Haynes to allow her daughter to serve as her statutory power of attorney, pursuant to her appointment papers on or about December 14, 2018.

Obviously, Ms. Haynes is not a threat to society and her life is in jeopardy and returning her to Alderson to be exposed to additional COVID-19 cases is life threatening.

II. CONCLUSION

For these reasons, Ms. Haynes requests that the Court grant Emergency Compassionate Release of Ms. Haynes so that she can remain in the hospital or be taken care of by her Power of Attorney, her daughter Patricia Haynes. The Defendant requests such other and further relief as this Court deems just.

JUANITA CARRIE HAYNES

By Counsel,

CICCARELLO, DEL GIUDICE & LAFON

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CERTIFICATE OF SERVICE

I, Timothy J. LaFon, do hereby certify that the foregoing **“Supplemental Memorandum of Law in Support of Motion for Compassionate Release”** has been served upon all parties via the Court’s electronic filing system on the 27th day of December 2021:

Drew O. Inman, Esq.
United States Attorney’s Office
P.O. Box 1713
Charleston, West Virginia 25326-1713

CICCARELLO, DEL GIUDICE & LAFON

By: /s/Timothy J. LaFon
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